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Attorneys for Defendant
DARYOL RICHMOND

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DARYOL RICHMOND,

Defendant.

CASE NO. 1:21-CR-00184-DAD-BAM

STIPULATION TO CONTINUE SENTENCING
DATE; ORDER

DATE: November 14, 2022
TIME: 8:30 a.m.
COURT: Honorable Ana De Alba

STIPULATION

Defendant Daryol Richmond, by and through his counsel of record, and plaintiff United States of America, by and through its counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for sentencing on November 14, 2022.
2. By this stipulation, defendant now moves to continue the sentencing until December 12, 2022 at 8:30 a.m. As this is a sentencing and a change of plea has already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Mr. Richmond was transferred from the custody of the United States Marshal to the custody of California Department of Corrections and Rehabilitation in March 2022.
 - b) While in state custody, defense counsel has been unable to contact Mr. Richmond

1 to meaningfully review the draft Presentence Investigation Report in order to comply with
2 related deadlines based on the current sentencing date of November 14, 2022. This is, in part,
3 due to Mr. Richmond being transferred with in the California prison system.

4 c) As a result, Mr. Richmond requests a short continuance to have more time to
5 discuss the Presentence Investigation Report and prepare for sentencing.

6 d) Defense Counsel is confident that she will be able to talk with Mr. Richmond
7 soon, and will be prepared to meet all related deadlines for sentencing on the requested date of
8 December 12, 2022.

9 e) This is Mr. Richmond's second request for a continuance, however, such a
10 continuance will not prejudice Mr. Richmond, as the plea agreement between the parties
11 stipulates for a sentence of at least 45 months incarceration.

12 f) Counsel for defendant believes that failure to grant the above-requested
13 continuance would deny her the reasonable time necessary for effective preparation and
14 argument at the sentencing hearing, taking into account the exercise of due diligence.

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g) The government does not object to the continuance.

IT IS SO STIPULATED.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Dated: October 27, 2022

/s/ Meghan D. McLoughlin
MEGHAN D. McLOUGHLIN
Counsel for Defendant
DARYOL RICHMOND

Dated: October 27, 2022

/s/ Joseph D. Barton
JOSEPH D. BARTON
Assistant United States Attorney

IT IS SO ORDERED.

Dated: October 28, 2022


UNITED STATES DISTRICT JUDGE